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**Lead Counsel for Lead Plaintiff and the Class**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

I.B.L. INVESTMENTS, LTD. Individually,  
And On Behalf Of All Others Similarly  
Situating,

Plaintiff,

vs.

TERAYON COMMUNICATIONS  
SYSTEMS, INC., ZAKI RAKIB, JERRY  
D. CHASE, MARK A. RICHMAN, and  
EDWARD LOPEZ,

Defendants.

**CASE NO.: 3-06-CV-03936 MJJ**

**CLASS ACTION**

**STIPULATION AND [PROPOSED]  
ORDER REGARDING SCHEDULING  
ISSUES**

1 WHEREAS, on September 11, 2006, the Clerk of the Court issued a notice (D.E. 7)  
2 requiring the parties to submit a joint case management statement to the Court on or before  
3 November 27, 2006, and to attend a status conference on December 5, 2006;

4 WHEREAS, on October 24, 2006, this Court entered an Order Regarding Schedule for  
5 Filing Amended Complaint and Responsive Documents (the "October 24 Order") (D.E. 22);

6 WHEREAS, on November 8, 2006, this Court entered an Order Granting Motion for  
7 Appointment of Lead Plaintiff and Approval of Chosen Counsel (D.E. 24);

8 WHEREAS, pursuant to the October 24 Order, certain deadlines were established for the  
9 filing of Lead Plaintiff's amended complaint and Defendants' motions to dismiss, if any;

10 WHEREAS, the parties agree that because this case is governed by the Private Securities  
11 Litigation Reform Act ("PSLRA"), 15 U.S.C. § 78u-4(a)(3), disposition of Defendants' anticipated  
12 motions to dismiss is warranted prior to the submission of a joint report and/or related status  
13 conference;

14 NOW THEREFORE, it is hereby STIPULATED and AGREED, subject to Court approval,  
15 that:

- 16 1. The deadlines established by the Clerk's September 11, 2006 Notice be vacated.

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2. Accordingly, the case management conference is adjourned until 30 days after the Court's ruling on a motion to dismiss or a time thereafter as the Court may determine.

Dated: November 21, 2006

Michael D. Braun  
BRAUN LAW GROUP, P.C.

By: /S/  
Michael D. Braun  
12400 Wilshire Blvd., Suite 920  
Los Angeles, CA 90025

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New Orleans, LA 70130

**Lead Counsel for Lead Plaintiff and the Class**

Dated: November 21, 2006

Patrick E. Gibbs  
Amy Stein  
LATHAM & WATKINS LLP

By: /S/  
Patrick E. Gibbs, Esq.  
140 Scott Drive  
Menlo Park, CA 94025

**Counsel for Terayon Communications Systems,  
Inc.**

**[PROPOSED] ORDER**

Upon the Stipulation of the parties, and for good cause appearing,

IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2006

\_\_\_\_\_  
HON. MARTIN J. JENKINS  
U. S. DISTRICT COURT JUDGE

**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
 )ss.:  
COUNTY OF LOS ANGELES )

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to the within action; my business address is 12400 Wilshire Boulevard, Suite 920, Los Angeles, CA 90025.

On November 22, 2006, using the Northern District of California's Electronic Case Filing System, with the ECF ID registered to Michael D. Braun, I filed and served the document(s) described as:

**STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULING ISSUES**

The ECF System is designed to automatically generate an e-mail message to all parties in the case, which constitutes service. According to the ECF/PACER system, for this case, the parties served are as follows:

Lionel Z. Glancy, Esq. [info@glancylaw.com](mailto:info@glancylaw.com)

Michael M. Goldberg, Esq. [info@glancylaw.com](mailto:info@glancylaw.com)

**Counsel for Plaintiffs**

Patrick Edward Gibbs [patrick.gibbs@lw.com](mailto:patrick.gibbs@lw.com)  
[zoila.aurora@lw.com](mailto:zoila.aurora@lw.com)

**Counsel for Defendant Terayon Communications Systems, Inc.**

On November 22, 2006, I served the document(s) described as:

**STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULING ISSUES**

by placing a true copy(ies) thereof enclosed in a sealed envelope(s) addressed as follows:

Maya Saxena, Esq.  
Joseph E. White, III., Esq.  
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5 **Counsel for Lead Plaintiff and the Class**

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10 Santa Clara, CA 95054

11 Mark A. Richman  
c/o Terayon Communications Systems, Inc.  
12 4988 Great America Parkway  
Santa Clara, CA 95054

13 Edward Lopez  
14 c/o Terayon Communications Systems, Inc.  
4988 Great America Parkway  
15 Santa Clara, CA 95054

16 **Defendants**

17 I served the above document(s) as follows:

18 BY MAIL. I am familiar with the firm's practice of collection and processing  
correspondence for mailing. Under that practice it would be deposited with U.S. postal service on  
19 that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course  
of business. I am aware that on motion of the party served, service is presumed invalid if postal  
20 cancellation date or postage meter date is more than one day after date of deposit for mailing in an  
affidavit.

21 I declare, pursuant to Civil L.R. 23-2, that on the date hereof I served a copy of the above-  
22 listed document(s) on the Securities Class Action Clearinghouse by electronic mail through the  
following electronic mail address provided by the Securities Class Action Clearinghouse:

23 [scac@law.stanford.edu](mailto:scac@law.stanford.edu)

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1 I am employed in the office of a member of the bar of this Court at whose direction the  
2 service was made.

3 I declare under penalty of perjury under the laws of the United States that the above is true  
4 and correct.

5 Executed on November 22, 2006, at Los Angeles, California 90025.

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7 /S/ LEITZA MOLINAR

8 Leitza Molinar  
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